

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

SRI INTERNATIONAL, INC.,	)	
a California Corporation,	)	
	)	
Plaintiff,	)	
	)	C. A. No. 04-1199 (SLR)
v.	)	
	)	
INTERNET SECURITY SYSTEMS, INC.,	)	
a Delaware Corporation,	)	
INTERNET SECURITY SYSTEMS, INC.,	)	
a Georgia Corporation and	)	
SYMANTEC CORPORATION,	)	
a Delaware Corporation,	)	
	)	
Defendants.	)	

**DEFENDANT ISS'S MOTION TO PRECLUDE SRI, BASED ON ITS CONDUCT  
IN DISCOVERY, FROM DISPUTING THE EVIDENCE ESTABLISHING THAT  
THE *LIVE TRAFFIC* PAPER IS A 102(b) INVALIDATING REFERENCE**

Defendants Internet Security Systems, Inc., a Georgia corporation and Internet Security Systems, Inc., a Delaware corporation, (collectively, "ISS") respectfully move this Court for an Order precluding SRI from disputing the evidence establishing that the *Live Traffic* paper is a 102(b) invalidating reference. The grounds for this Motion are more fully set forth in the Opening Brief in support of this Motion, filed contemporaneously herewith.

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Dated: June 30, 2006

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*INTERNET SECURITY SYSTEMS, INC.,*  
*a Georgia corporation*

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**CERTIFICATE OF SERVICE**

I, David E. Moore, hereby certify that on June 30, 2006, the foregoing document was hand delivered to the following persons and was electronically filed with the Clerk of the Court using CM/ECF which will send notification of such filing(s) to the following and the document is available for viewing and downloading from CM/ECF:

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